

AO91 (Rev 12/03) Criminal Complaint

AUSA P. Warner

UNITED STATES DISTRICT COURT

Southern District of Texas McAllen Division

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

United States Courts
Southern District of Texas
FILED

Case Number: 7:25-po-01140

Mahdie Najafi VASHVAEE

April 9, 2025

IAE

Iran 1991

Nathan Ochsner, Clerk of Court

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about April 8, 2025 in Starr County, in the Southern District Of Texas defendant(s) did,

Being then and there an alien, did, knowingly and unlawfully enter the United States at a place other than as designated by immigration officers;

in violation of Title 8 United States Code, Section(s) 1325(a)(1)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

Mahdie Najafi VASHVAEE was encountered by Border Patrol Agents near Fronton, Texas, on April 8, 2025. When questioned as to her citizenship, defendant stated that she was a citizen and national of Iran, who had entered the United States illegally on April 8, 2025 by crossing the Rio Grande River near Fronton, Texas.

I DECLARE UNDER PENALTY OF PERJURY THAT THE STATEMENTS IN THIS COMPLAINT ARE TRUE AND CORRECT.

Continued on the attached sheet and made a part of this complaint: ☐ Yes ☒ No

/S/ Laureano Cantu

Signature of Complainant

Border Patrol Agent Laureano Cantu

Printed Name of Complainant

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on

April 9, 2025 at 7:17 p.m.

Date

McAllen, Texas


City/State

J. Scott Hacker

Magistrate Judge

Name of Judge

Title of Judge


Signature of Judge